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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

LINWEI DING,

Defendant.

) CASE NO. 3:24-cr-00141-VC

) **[PROPOSED] ORDER DENYING**  
) **DEFENDANT'S MOTION TO MODIFY**  
) **PROTECTIVE ORDER**

) The Honorable Vince Chhabria  
) Courtroom 4, 17th Floor

) Hearing: 1:00 pm on March 19, 2025

**[PROPOSED] ORDER**

**FOR GOOD CAUSE SHOWN**, it is hereby **ORDERED** that:

1. Defendant Linwei Ding's motion (Dkt. 53) to modify the Stipulated Interim Protective Order (Dkt. 13) is denied.

2. Paragraph 3 of the Stipulated Interim Protective Order (Dkt. 13) is amended to permit Defendant Linwei Ding to review Confidential Material in the U.S. offices of THE DEFENDANT's counsel on a non-networked, secure, review-only laptop maintained by THE DEFENDANT'S counsel, without the presence of or supervision by THE DEFENDANT's counsel or their staff; *provided*, *however*, that the laptop shall have all USB ports disabled to prevent downloads to external devices, storage, or cloud platforms and THE DEFENDANT'S counsel shall collect all electronic devices and means to take notes from THE DEFENDANT before his review of Confidential Material and return such devices and means to THE DEFENDANT after his review. THE DEFENDANT may insert notes on the laptop, which shall be accessible only to THE DEFENDANT'S counsel by means of a secure transfer process facilitated by THE DEFENDANT'S counsel.

Dated: \_\_\_\_\_, 2025

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HON. VINCE CHHABRIA